

IN THE COURT OF COMMON PLEAS  
MONTGOMERY COUNTY, OHIO

<b>MIAMI VALLEY HOSPITAL</b>	)	CASE NO.
One Wyoming Street	)	
Dayton, OH 45409	)	JUDGE
	)	
Plaintiff,	)	
	)	<b><u>COMPLAINT</u></b>
v.	)	
	)	
<b>FIRSTHEALTH INSURANCE</b>	)	
<b>GROUP, CORPORATION</b>	)	
c/o Registered Agent	)	
<b>CT Corporation</b>	)	
4400 Easton Commons Way	)	
Suite 125	)	
Columbus, OH 43218	)	
	)	
Defendant.	)	

NOW COMES Plaintiff, Miami Valley Hospital, by and through its counsel, and for its cause of action against Defendant, First Health, says that:

1. The within cause of action arose in Montgomery County, Ohio.
2. At all times relevant, Plaintiff, Miami Valley Hospital, was a not-for-profit corporation, registered in the State of Ohio, conducting business as a hospital.
3. At all times relevant, Defendant First Health Insurance Group, (hereinafter FirstHealth) was a corporation registered in the State of Ohio, conducting business as a health insurance carrier.
4. Plaintiff provided medical service to Defendant FirstHealth's insured, Logan Potter, from 03/30/2017 through 04/18/2017, further identified as patient account no.\*\*\*\*\*0459.
5. Following Logan Potter's discharge from the hospital, a bill for \$300,845.59 was submitted to FirstHealth for services rendered to Logan Potter. A copy of the account statement is not attached to this Complaint in order to protect the patient's personal health information.



However, a statement was provided to Defendant, and one will be provided to this Court upon request and under seal.

6. FirstHealth denied for being a secondary payer to Medicaid, in direct contradiction of Ohio law.

7. Defendant FirstHealth is indebted to Plaintiff in the amount of \$300,845.59 for medical services rendered. Defendant First Health failed to pay the charges for this account.

8. Demand has been made upon Defendant to liquidate the balance; however, Defendant has failed to do so.

WHEREFORE, Plaintiff, Miami Valley Hospital, prays that this Court grant Plaintiff judgment against Defendant, First Health, in the amount of \$300,845.59 together with interest at the statutorily allowed rate from the date of judgment and costs of the within action.

Respectfully submitted,

**DREYFUSS WILLIAMS & ASSOCIATES CO., L.P.A.**

By: 

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